

Proposed Redacted Version of the  
Declaration of Qiwen ("Carrol") Xia in  
Support of Defendant Meta Platforms,  
Inc.'s Response to Order to Show Cause  
Regarding CAFA Jurisdiction

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*Attorneys for Defendant Meta Platforms, Inc.*

IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

MARY YOON, et al.,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 5:24-CV-02612-NC

**DECLARATION OF QIWEN (“CARROL”) XIA IN SUPPORT OF DEFENDANT META PLATFORMS, INC.’S RESPONSE TO ORDER TO SHOW CAUSE REGARDING CAFA JURISDICTION**

Action Filed: March 27, 2024  
 Honorable Nathanael M. Cousins

1 I, Qiwen (“Carrol”) Xia, state and declare as follows:

2 1. I am a data scientist at Meta. The information in this declaration is based on my  
3 personal knowledge and discussion with relevant personnel. If called and sworn as a witness, I could  
4 and would testify competently to this information.

5 2. I have worked at Meta as a data scientist since January 2021. My job responsibilities  
6 include, among other things, understanding and working with Meta’s data systems, writing queries  
7 and conducting analyses of data within Meta’s systems, researching Meta’s data and related  
8 technologies, and locating, analyzing, and exporting data for production in litigation and other legal  
9 matters.

10 3. I understand that the plaintiffs in this case allege HGTV.com, Bloomberg.com,  
11 USAToday.com, 247Sports.com, and PBS.com (the “relevant websites”) installed the Meta Pixel on  
12 their websites.

13 4. On December 10, 2024, I reviewed the five Pixel IDs that I understand plaintiffs’  
14 counsel provided to counsel for Meta to determine the first date Meta received data from each Pixel  
15 ID (its “first fire date”) and the approximate last date Meta received data from each Pixel ID (its “last  
16 fire date”). Each Pixel ID as well as the first and last fire dates as of December 10, 2024 are listed  
17 below.

18 5. On December 10, 2024, I reviewed Meta’s systems for Pixel ID 665960526897455,  
19 which I understand plaintiffs identified as a pixel in use by one of the relevant entities. Based on my  
20 review, I confirmed that this Pixel ID had fired from HGTV.com [REDACTED]. I also  
21 confirmed that the first fire date for this Pixel ID was [REDACTED] per Meta’s data records.

22 6. On December 10, 2024, I reviewed Meta’s systems for Pixel ID 227995338998622,  
23 which I understand plaintiffs identified as a pixel in use by one of the relevant entities. Based on my  
24 review, I confirmed that this Pixel ID had fired from Bloomberg.com [REDACTED]. I also  
25 confirmed that the first fire date for this Pixel ID was [REDACTED] per Meta’s data records.

26 7. On December 10, 2024, I reviewed Meta’s systems for Pixel ID 1613278598987210,  
27 which I understand plaintiffs identified as a pixel in use by one of the relevant entities. Based on my  
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1 review, I confirmed that this Pixel ID had fired from USAToday.com [REDACTED] days. I also  
2 confirmed that the first fire date for this Pixel ID was [REDACTED] per Meta's records.

3 8. On December 10, 2024, I reviewed Meta's systems for Pixel ID 492061434251936,  
4 which I understand plaintiffs identified as a pixel in use by one of the relevant entities. Based on my  
5 review, I confirmed that this Pixel ID had fired from PBS.com [REDACTED]. I also  
6 confirmed that the first fire date for this Pixel ID was [REDACTED] per Meta's records.

7 9. On December 10, 2024, I reviewed Meta's systems for Pixel ID 1575186632756631,  
8 which I understand plaintiffs identified as a pixel in use by one of the relevant entities. Based on my  
9 review, I confirmed that this Pixel ID had fired from 247Sports.com [REDACTED]. I also  
10 confirmed that the first fire date for this Pixel ID was [REDACTED] per Meta's records.

11 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
12 and correct. Executed this 13th day of December 2024 in Menlo Park, California.

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14 DATED: December 13, 2024

**GIBSON, DUNN & CRUTCHER LLP**

15 Signed by:  
16 By: Qiwen Xia  
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18 Qiwen ("Carrol") Xia  
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